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Attorneys for Plaintiff
SONJA ALVAREZ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SALVADOR SILVA, DECEASED, by and through)
his Successor in Interest, SONJA ALVAREZ,)
SONJA ALVAREZ, Individually,)

Plaintiff,

vs.

SAN JOAQUIN COUNTY, a public entity; SAN)
JOAQUIN COUNTY SHERIFF-CORONER)
PATRICK WITHROW, in his individual and official)
capacities; ROBERT HART, M.D.; FOZIA NAR,)
L.V.N.; MARY CEDANA, R.N.; SARAI)
HARDWICK, L.V.N.; CYNTHIA BORGES-)
ODELL, MFT; NICHOLE WARREN, P.T.;)
MANUEL RODRIGUEZ-GALAVIZ, MFT;)
MARICEL MAGAOAY, L.V.N.; MANDEEP)
KAUR, R.N.; CHERYL EVANS, A.S.W.;)
CHRISTEL BACKERT, FNP; ROBYN MENDOZA,)
NP, and DOES 1–20; individually, jointly, and)
severally,)

Defendants.

Case No. 2:20-cv-01461-JAM-CSK

STIPULATION AND
~~(PROPOSED)~~ ORDER
EXTENDING DEADLINE FOR
REDACTION OF DOCUMENTS

1 All parties, by and through their counsel of record, stipulate and hereby move this Court to
2 extend the deadlines related to the filing of redacted documents pursuant to this Court's Minute
3 Order requiring the filing of redacted documents. (ECF No. 68). Good cause exists to grant the
4 requested extension:
5

6 1. At the hearing on Defendants' motion for documents, the Court ordered the parties to
7 meet and confer about the redaction of documents related to Defendants' discovery motion for
8 documents by close of business on May 30, 2024, and to file the redacted documents by close of
9 business on May 31, 2024. *See also*, ECF No. 68.

10 2. Defense Counsel, Gregory Thomas, asked the Court for permission to seek an
11 extension on these deadlines by email, which the Court granted. Defense counsel also informed the
12 Court the parties would be mediating this case on May 31, 2024.

13 3. On May 29, 2024, the parties requested by email, pursuant to permission from the
14 Court, a one-week extension of the deadlines.

15 4. On May 30, 2024, the Court's chambers instructed the parties to submit a
16 Stipulation.
17

18 5. Plaintiff's counsel, Michael J. Haddad and Julia Sherwin, are married. They were
19 both out of the office for two weeks from May 13, 2024, through May 24, 2024, due to Mr. Haddad
20 requiring surgery and home care afterward. (ECF No. 57).

21 6. Their associate, Teresa Allen, who handled the underlying discovery issue on behalf
22 of Plaintiff, left the employment of the firm effective May 25, 2024. (ECF No. 66).

23 7. Mr. Haddad has been able to return to work part-time only this week. Ms. Sherwin
24 is required to handle all matters requiring attention during Mr. Haddad's absence, in addition to
25 handling all administrative matters involving Ms. Allen's departure.
26

27 8. Defense counsel also has pressing matters to attend to in other cases.
28

1 9. The parties and their counsel will be in a daylong mediation of this case on Friday,
2 May 31, 2024, when the redacted documents are due.

3 10. The parties stipulate and agree, and request the Court to approve, continuing the
4 dates to meet and confer about redaction, and to file redacted documents, for one week: completion
5 of meet and confer efforts by June 6, 2024, and filing of redacted documents by June 7, 2024.

6 For the foregoing reasons, the parties respectfully request that this Court enter an order
7 extending these two deadlines as set forth above.
8

9
10 Dated: May 30, 2024

HADDAD & SHERWIN LLP

11
12 */s/ Julia Sherwin*

13 _____
JULIA SHERWIN
Attorneys for Plaintiff

14
15 Dated: May 30, 2024

BURKE, WILLIAMS & SORENSON, LLP

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17 */s/ Gregory B. Thomas*

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GREGORY B. THOMAS
Attorneys for Defendants
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(PROPOSED) ORDER

Based on the parties' stipulation, and with good cause appearing,

IT IS SO ORDERED.

Dated: May 30, 2024



HON. CHI SOO KIM
United States Magistrate Judge